

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION  
(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

PARSON FINANCE PANAMA S.A.,

Defendant.

Adv. Pro. No. 11-02542 (CGM)

**DECLARATION OF CHRISTIAN VERLING  
IN SUPPORT OF MOTION TO DISMISS**

Christian VERLING, being duly sworn, declares the following under penalty of perjury:

1. I am the President and Chief Executive Officer of Parson Finance Panama, S.A. ("Parson Finance"). I submit this declaration in support of Parson Finance's motion to dismiss the Complaint.

2. I have served as President and as one of the three directors of Parson Finance since it was incorporated in Panama on September 27, 2002. I am fully familiar with all of the facts set forth in this Declaration.

3. I am a citizen of Liechtenstein and I reside in Liechtenstein. None of the other directors or officers of Parson Finance are currently citizens or residents of the United States.

4. Parson Finance was originally incorporated in the British Virgin Islands. It transferred its incorporation to Panama on September 27, 2002. Parson Finance has at all times since been managed by Bamont Trust Company Limited, located in Nassau, Bahamas.

5. Parson Finance has never maintained an office in the United States.

6. Parson Finance has never owned or leased any real estate in the United States.

7. Parson Finance has never conducted any business in the United States.

8. No officer or representative of Parson Finance met with any representative of Fairfield Sentry or Fairfield Greenwich Group in the United States in connection with Parson Finance's investment in Fairfield Sentry. On June 16, 2003 a representative of Parson Finance met with Richard Lansberger of Fairfield Greenwich Group in London. Later that month Parson Finance's investment committee decided to invest US\$10,000,000.00 in Fairfield Sentry.

9. Parson Finance sent the subscription documents to Citco Funding Services (Europe) B.V. in the Netherlands. Exhibit 1. Exhibit 2 is Citco's confirmation of the subscription.

10. All of Parson Finances transactions with Fairfield Sentry were conducted

through Citco Fund Services (Europe) B.V., located in Amsterdam, The Netherlands.

11. Parson Finance directed Citco Fund Services (Europe) B.V. to redeem all of Parson Finance's shares in Fairfield Sentry Limited by letter dated February 15, 2004, attached as Exhibit 3. Parson Finance directed payment to be made in the name of Royal Trust Corporation of Canada ("RTC") for its account with RTC. Exhibit 4 is the excerpt from Parson Finance's statement from RTC that shows that on April 15, 2005 the proceeds of the Fairfield Sentry redemption posted to Parson Finance's account with RTC in London, United Kingdom.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States, that the foregoing statements are true and correct to the best of my knowledge and belief.

Dated: February 16, 2022  
Vaduz, Liechtenstein



Christian VERLING